

1 MICHAEL A. JACOBS (CA SBN 111664)
2 MJacobs@mofo.com
3 ARTURO J. GONZÁLEZ (CA SBN 121490)
4 AGonzalez@mofo.com
5 MORRISON & FOERSTER LLP
6 425 Market Street
7 San Francisco, California 94105-2482
8 Telephone: 415.268.7000
9 Facsimile: 415.268.7522

10 KAREN L. DUNN (*Pro Hac Vice*)
11 kdunn@bsfllp.com
12 HAMISH P.M. HUME (*Pro Hac Vice*)
13 hhume@bsfllp.com
14 BOIES SCHILLER FLEXNER LLP
15 1401 New York Avenue, N.W.
16 Washington DC 20005
17 Telephone: 202.237.2727
18 Facsimile: 202.237.6131

19 WILLIAM CARMODY (*Pro Hac Vice*)
20 bcarmody@susmangodfrey.com
21 SHAWN RABIN (*Pro Hac Vice*)
22 srabin@SusmanGodfrey.com
23 SUSMAN GODFREY
24 1301 Avenue of the Americas, 32nd Floor
25 New York, NY 10019-6023
26 Telephone: 212.336.8330
Facsimile: 212.336.8340

27 Attorneys for Defendants
28 UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

19 UNITED STATES DISTRICT COURT
20 NORTHERN DISTRICT OF CALIFORNIA
21 SAN FRANCISCO DIVISION

22 WAYMO LLC,
23 v.
24 UBER TECHNOLOGIES, INC.,
25 OTTOMOTTO LLC; OTTO TRUCKING LLC,
26 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF
MICHELLE YANG IN SUPPORT OF
DEFENDANTS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
THEIR OPPOSITION TO WAYMO'S
MOTION TO COMPEL STROZ-
RELATED DISCOVERY**

1 I, Michelle Yang, declare as follows:

2 1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this
 3 declaration based upon matters within my own personal knowledge and if called as a witness, I
 4 could and would competently testify to the matters set forth herein. I make this declaration in
 5 support of Defendants' Administrative Motion to File Under Seal Their Opposition to Waymo's
 6 Motion To Compel Stroz-Related Discovery.

7 2. I have reviewed the following documents and confirmed that only the portions
 8 identified below merit sealing:

Document	Portions to Be Filed Under Seal	Designating Party
Exhibit C	Highlighted Portions	Defendants (Blue)
Exhibit L	Highlighted Portions	Plaintiff (Green)

9 3. The blue-highlighted portions of Exhibit C to the Rivera Declaration contain
 10 confidential personal information of a certain employee. Defendants request this information be
 11 kept under seal to protect individual privacy interests because this lawsuit is currently the subject
 12 of extensive media coverage. I understand that disclosure of this information could expose this
 13 individual to harm or harassment.

14 4. The green-highlighted portions of Exhibit L to the Rivera Declaration contain
 15 information that has been designated "Highly Confidential – Attorneys' Eyes Only" or
 16 "Confidential" by Waymo in accordance with the Patent Local Rule 2-2 Interim Model Protective
 17 Order ("Protective Order"), which the parties have agreed governs this case (Transcript of
 18 3/16/2017 Hearing, page 6). Defendants file this material under seal in accordance with
 19 Paragraph 14.4 of the Protective Order.

20 5. Defendants' request to seal is narrowly tailored to the portions of their Opposition
 21 and its supporting papers that merit sealing.

1 I declare under penalty of perjury that the foregoing is true and correct. Executed this
2 17th day of October, 2017 in Washington, District of Columbia.
3
4

/s/ Michelle Yang

Michelle Yang

7 **ATTESTATION OF E-FILED SIGNATURE**

8 I, Arturo J. González am the ECF User whose ID and password are being used to file this
9 Declaration. In compliance with General Order 45, X.B., I hereby attest that Michelle Yang has
10 concurred in this filing.

11 Dated: October 17, 2017

/s/ Arturo J. González

ARTURO J. GONZÁLEZ